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June 14, 2024

VIA ECF

Hon. Louis L. Stanton, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street York, New York 10007

> Re: Mullen Automotive, Inc. v. IMC Financial Markets, et al., Case No. 1:23-cv-10637-LLS

Dear Judge Stanton:

We represent Plaintiff Mullen Automotive, Inc. ("Mullen") and write to respectfully request an extension of Plaintiffs' time to file an opposition to Defendants' pending Motion to Dismiss the First Amended Complaint [ECF No. 37] (the "Motion") from June 17, 2024 to August 2, 2024. Defendants consent to this request.

Our firm was recently retained to take over as lead counsel for Mullen and filed notices of appearance on Wednesday, June 12, 2024. *See* ECF Nos. 51-53. We also expect to be retained to represent the individual Plaintiffs (Hyon Cha and Shayan Khorrani) next week. The additional time will allow our firm to review the pending motion and adequately to respond to the arguments therein.

Accordingly, we respectfully request that Plaintiffs' time to respond to the Motion be extended to August 2, 2024. We thank the Court for its attention to this matter.

Respectfully,

Stephen W. Tountas

cc: All counsel of record (via ECF)